1 2 3 4 5 6	Thomas F. Christensen, Esq. Nevada Bar #2326 Christensen Law Offices, LLC 1000 S. Valley View Blvd. Las Vegas, NV 89107 T:702-870-1000 courtnotices@injuryhelpnow.com Attorneys for Defts Kabul & Alexander	
7	IN THE UNITED STATES DISTRICT COURT DISTRICT OF NEVADA	
8	ADMIRAL INSURANCE COMPANY,	Case No.: 2:22-cv-00177-CDS-NJK
9	Plaintiff	
10	vs.	STIPULATION AND ORDER TO EXTEND TIME TO FILE A
11	KABUL, INC. d/b/a FASTRIP PWC	PRE-TRIAL ORDER
12	RENTALS, KABUL, INC. d/b/a FASTRIP FOOD STORE, DARRYL PETER	
13	ALEXANDER, JR.,	[ECF No. 155]
14	Defendants	
15		
16	KABUL, INC.,	
17	Third Party Plaintiff	
18	V.	
19	GREGG EIDSNESS FARM BUREAU	
20	FINANCIAL SERVICES, DOES I through X, inclusive; and ROE CORPORATIONS I	
21	through X, inclusive,	
22	Third Party Defendant	
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Defendant/Third-Party Plaintiff Kabul, Inc. ("Kabul"), and Third-Party Defendant Gregg Eidsness Farm Bureau Financial Services ("GEFB") (collectively, the "Parties"), by and through their respective counsel, hereby stipulate and agree, subject to this Court's approval, to extend time to file a pre-trial order. LR 26-1(b)(5) provides, "[i]f dispositive motions are filed, the deadline for filing the joint pretrial order will be suspended until 30 days after decision on the dispositive motions or further court order." This Court issued its Order Resolving Pending Motions for Summary Judgment (the "MSJ Order") (ECF No. 147) on August 14, 2024. As such, the deadline for filing the joint pretrial order was September 13, 2024. The Parties thereafter requested a 90-day extension on the deadline to file a pre-trial order (ECF No. 151), however the Court denied the stipulation without prejudice (ECF No. 152) on October 7, 2024, ordering the parties to file a joint proposed pretrial order on or before November 7, 2024.

The parties hereto believe good cause exists to grant a short extension of the new deadline for a joint proposed pretrial order. As the Court was previously advised, the Parties have been discussing settlement and are looking to participate in a mediation. The Parties have worked on the proposed pretrial order; however, there are more than 3000 exhibits that had previously been disclosed by Admiral Insurance Company and the parties must try to reach agreement as to admissibility of voluminous documents. Additionally, the parties had hoped to mediate the case prior to November 7, 2024; however, the first available date for the mediation that was convenient for all parties and the mediator is November 14, 2024. That mediation is set for the full day on November 14, 2024. In fact, briefs for that proceeding are due today and the finalization of the proposed joint pretrial order requires a significant additional amount of time and effort that is taking away from preparation for and focus upon potential settlement and the mediation. Additionally, Kabul was just served today with a new suit filed by Admiral Insurance Company against it for damages. The preparation of a jointly proposed pre-trial order in this complex matter will consume

The preparation of a jointly proposed pre-trial order in this complex matter will consume substantial client resources and attorney time, but the jointly proposed pre-trial order will be unnecessary if the settlement conference results in a settlement of this matter. Granting the requested short extension and affording the Parties additional time to prepare for and focus on the mediation and potential settlement in this circumstance promotes judicial economy, as the Parties may be able to settle and avoid proceeding to trial.

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Based on the foregoing, the parties stipulate and request that the Court enter an order extending time for the parties to file a pre-trial order to December 9, 2024. This request is made in good faith and not to delay the trial preparation process. Dated this 7th day of November, 2024. CHRISTENSEN LAW OFFICES, LLC GORDON REES SCULLY MANSUKHANI, LLP BY: /s/Thomas Christensen BY: /s/Henry H. Kim THOMAS CHRISTENSEN, ESQ. ROBERT E. SCHUMACHER, ESQ. Nevada Bar No. 2326 Nevada Bar No. 7504 1000 S. Valley View Blvd. HENRY H. KIM, ESQ. Las Vegas, Nevada 89107 300 S. 4th Street, Suite 1550 courtnotices@injuryhelpnow.com Las Vegas, NV 89101 rschumacher@grsm.com hhkim@grsm.com The parties' stipulation [ECF No. 155] is approved. The deadline to file a proposed joint pretrial order is extended to December 9, 2024. United States District Judge **DATED:** November 12, 2024